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July 15, 2020

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VIA ECF

The Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10005

Re: *United States v. Sylvia Ash*, 19-cr-780 (LAK)

Dear Judge Kaplan:

We represent Ms. Sylvia Ash in the above captioned matter. We respectfully request that the Court modify the terms of Ms. Ash's bond by substituting property owned by Carolie Realty Corporation, of which Ms. Ash is the sole shareholder, for the collateral currently securing her bond. The government, by Assistant United States Attorneys Dan Richenthal and Eli Mark, and the United States District Court Pretrial Services Office for the Southern District of New York, by Lea Harmon to whom Ms. Ash reports, consent to this request.

On October 15, 2019, as one condition of her pre-trial release on bail, Ms. Ash pledged her residence in Brooklyn as collateral to secure a bond of \$500,000, co-signed by three financially responsible persons [ECF No. 5]. On December 16, 2019, Your Honor granted Ms. Ash's request to modify her bail conditions to remove her GPS monitoring bracelet and to increase the secured bond amount to \$750,000 and have four financially responsible persons co-sign the bond [ECF No. 22]. Ms. Ash does not request that any of these conditions be modified. Rather, Ms. Ash requests permission to substitute as collateral securing the bond her residence in Brooklyn with another property located in Brooklyn owned by Carolie Realty Corp. of which Ms. Ash is the sole shareholder. Ms. Ash seeks to substitute the collateral securing her bond in order to obtain a loan secured by her Brooklyn residence, the proceeds of which will be used, in part, to pay Ms. Ash's defense costs in connection with this matter. Ms. Ash further respectfully requests that should her substitute collateral request be granted, the Court also grant her permission to take any actions necessary, upon the signing of a new bond substituting the collateral securing that bond as

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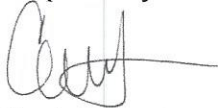
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described above, to have any confessions of judgment filed in connection with the previous secured bond be dismissed, removed, or otherwise disposed of.

Ms. Ash agrees, should the Court permit the above requested modification, to take any other steps necessary to secure the substituted collateral including by a confession of judgment and further agrees that, during the pendency of this matter, not to sell, dispose of, alter the ownership or structure of, take out a loan on, or otherwise dilute or encumber her ownership of Carolie Realty Corp., which owns the property proposed to serve as substituted collateral to secure her bond.

Based on the foregoing, we respectfully request that the Court grant Ms. Ash's request to substitute the collateral securing her \$750,000 bond and to have any confessions of judgment that reflect that her bond is secured by her residence in Brooklyn be dismissed, removed, or otherwise disposed of.

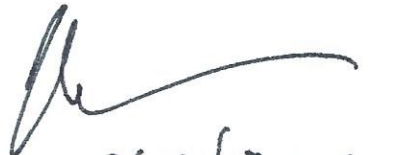
Respectfully submitted,



Carrie H. Cohen

cc by ECF: ASUAs Daniel Richenthal and Eli Mark

Granted on consent


8/10/2020